



STATE OF MAINE  
DEPARTMENT OF EDUCATION  
23 STATE HOUSE STATION  
AUGUSTA, MAINE  
04333-0023

PAUL R. LEPAGE  
GOVERNOR

Thomas A. Desjardin  
ACTING COMMISSIONER

EXHIBIT #VIII.F.

TO: Member of the State Board of Education

FROM: Thomas A. Desjardin, Acting Commissioner\*

DATE: January 14, 2015

SUBJECT: Approval of the recommendation of the Certification and Higher Education Committee to accept the proposed changes to Ch. 13 as suggested by commenters, and to approval an extension of the comment period for an additional 30 days for proposed revisions to Section 3.10. The proposed changes to Section 3.10 will relieve an applicant from the burden of having to take the PLT and the Praxis I tests when applying for a new credential when the applicant has a lapsed credential.

Attachments:

1. The proposed final rule without the changes to Section 3.10;
2. The proposed changes to Section 3.10 with all changes and comments.

**BACKGROUND:** The revision to Section 13.3.10, at 10, was not in mind when the proposed rule was made because the focus of the proposed rule was to implement the changes to the Praxis tests that the Educational Testing Service (ETS) makes every 5 years. During the running of the Notice period, the inequity in Section 13.3.10 that has existed for some time came to mind and was recognized as of sufficient importance to address during this rule-making process. A new comment period is required for this change because it is substantively different from the notice of proposed rule published on October 29, 2014.

Section 3.10 waives the PLT and Praxis I tests for “applicants who hold a current teaching certificate from another state who are seeking a teaching certificate in the same endorsement area.” The practice has been to tell an applicant with a lapsed credential that if they renew their lapsed credential from out of state they can avoid taking the tests.

As can be seen, it is the fact of having held a full teaching credential, not whether the applicant has ever taken the PLT or the Praxis I that determines whether the applicant has the basic knowledge that is required to obtain a teaching credential. Accordingly, it is excessive to require PLT and Praxis I when the teaching credential is lapsed because passing the PLT and Praxis I test will not enable a teacher to renew the lapsed credential. The Praxis I test is to assess whether a person has sufficient high school level knowledge to be able to become a teacher, and PLT is a basic methods and pedagogy test to assess that knowledge of a beginning teacher. All teachers must pass a specific content methods course to have a full credential in a particular endorsement area.

By the same logic, an applicant who has held a full teaching credential in any endorsement area should not be required to take these basic tests since the tests do not show or advance the knowledge needed for any specific subject area teaching credential.

In-state applicants and out-of-state applicants have been treated equally regarding the need to take PLT and Praxis I. No rule made that explicit until this proposed revision.

Not all Educational Specialists credential areas are required to take the PLT, such as School Nurse, Athletic Director, School Psychologists and Vocational Education Evaluator. The PLT will be required for these specialists when applying a specialty area that requires the PLT.

**PROPOSED TIMELINE:**

File with the Secretary of State's Office – On or before January 20, 2015

Posting – January 28, 2015

Public Hearing – (N/A)

Deadline for Comments – February 27, 2015

Deadline for Response to Comments – March 6, 2015

Final Adoption – March 11, 2015

**RECOMMENDATION:** The State Board of Education's Certification and Higher Education Committee recommends that the State Board of Education accept the revisions that were based upon the comments received, and further recommends that an additional comment period of 30 days be allowed for the suggested revisions to Section 3.10.

Prepared by: Arthur J. Keenan, Certification Legal Consultant